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Attorneys for Defendants STRUCTURE TONE, INC. s/h/a STRUCTURE TONE  
(UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION

-----X  
RAMON ZAMBRANA,

Plaintiffs,

-against-

**NOTICE OF  
ADOPTION**

ON SITE:

**08 CIV 2320**

7 WORLD TRADE COMPANY, L.P.; A RUSSO WRECKING,  
INC.; ABM INDUSTRIES, INC.; ABM JANITORIAL  
NORTHEAST, INC.; AMEC CONSTRUCTION  
MANAGEMENT, INC.; AMEC EARTH &  
ENVIRONMENTAL, INC.; ANTHONY CORTESE  
SPECIALIZED HAULING LLC.; ATLANTIC HEYDT  
CORP.; BECHTEL ASSOCIATES PROFESSIONAL  
CORPORATION; BECHTEL CONSTRUCTION, INC.;  
BECHTEL CORPORATION; BECHTEL ENVIRONMENTAL,  
INC.; BERKEL & COMPANY, CONTRACTORS, INC.;  
BIG APPLE WRECKING & CONSTRUCTION CORP.;  
BOVIS LEND LEASE LMB, INC.; BREEZE CARTING  
CORP.; BREEZE NATIONAL INC.; BRER-FOUR  
TRANSPORTATION CORP.; BURO HAPPOLD  
CONSULTING ENGINEERS, P.C.; C.B. CONTRACTING  
CORP.; CANRON CONSTRUCTION CORP.; CORD  
CONTRACTING CO., INC.; DAKOTA DEMO-TECH;  
DIAMOND POINT EXCAVATING CORP.; DIEGO  
CONSTRUCTION, INC.; DIVERSIFIED CARTING, INC.;  
DMT ENTERPRISE, INC.; D'ONOFRIO GENERAL  
CONTRACTORS CORP.; EAGLE LEASING &  
INDUSTRIAL SUPPLY, INC.; EAGLE ONE ROOFING  
CONTRACTORS INC.; EJ DAVIES, INC.; EN-TECH

CORP.; EVERGREEN RECYCLING OF CORONA (EROC);  
EWELL W. FINLEY, P.C.; EXECUTIVE MEDICAL  
SERVICES, P.C.; FLEET TRUCKING, INC.; FRANCIS  
A. LEE EXTERIOR RESTORATION, INC.; FTI  
TRUCKING, INC.; GILSANZ, MURRAY, & STEFICEK,  
LLP; GOLDSTEIN ASSOCIATES CONSULTING  
ENGINEERS, PLLC; HALLEN WELDING SERVICE,  
INC.; H.P. ENVIRONMENTAL; KOCH SKANSKA INC.;  
LAQUILA CONSTRUCTION INC.; LASTRADA  
GENERAL CONTRACTING CORP.; LESLIE E.  
ROBERTSON ASSOCIATES CONSULTING ENGINEERS,  
P.C.; LIBERTY MUTUAL GROUP; LOCKWOOD,  
KESSLER & BARTLETT, INC.; LUCIUS PITKIN, INC.;  
LZA TECH-DIV OF THORTON TOMASETTI; MANAFORT  
BROTHERS INCORPORATED; MAZZOCCHI WRECKING,  
INC.; HUDSON MERIDIAN CONSTRUCTION GROUP, LLC  
F/K/A MERIDIAN CONSTRUCTION CORP.; MORETRENCH  
AMERICAN CORP.; MRA ENGINEERING, PC; MUESER  
RUTLEDGE CONSULTING ENGINEERS, INC.; NACIREMA  
INDUSTRIES INCORPORATED; NEW YORK CRANE &  
EQUIPMENT CORP.; NICHOLSON CONSTRUCTION  
COMPANY; PETER SCALAMANDRE & SONS, INC.;  
PINNACLE ENVIRONMENTAL CORP.; PLAZA  
CONSTRUCTION CORP.; PORT AUTHORITY OF NEW  
YORK AND NEW JERSEY; PRO SAFETY SERVICES LLC;  
PT & L CONTRACTING CORP.; ROBER SILMAN ASSOCIATES;  
ROBERT L. GEROSA, INC.; RODAR ENTERPRISES, INC.;  
ROYAL GM, INC.; SAB TRUCKING INC.; SAFEWAY  
ENVIRONMENTAL CORP.; SEASONS INDUSTRIAL  
CONTRACTING; SEMCOR EQUIPMENT & MANUFACTURING  
CORP.; SILVERITE CONTRACTING CORPORATION;  
SIMPSON GUMPERTZ & HEGER INC.; SKIDMORE  
OWING & MERRILL LLP; SURVIVAIR; TISHMAN  
CONSTRUCTION CORPORATION OF MANHATTAN;  
TISHMAN CONSTRUCTION CORPORATION OF NEW YORK;  
TISHMAN INTERIORS CORPORATION; TISHMAN  
SPEYER PROPERTIES; THORTON-TOMASETTI GROUP,  
INC.; TORRETTA TRUCKING, INC.; TOTAL SAFETY  
CONSULTING, L.L.C.; TUCCI EQUIPMENT RENTAL CORP.;  
TULLY CONSTRUCTION CO., INC.; TURNER CONSTRUCTION  
COMPANY; ULTIMATE DEMOLITION/CS HAULING (JOINT  
VENTURE); VOLLMER ASSOCIATES LLP; WEEKS MARINE,  
INC.; WEIDLINGER ASSOCIATES, CONSULTING  
ENGINEERS, P.C.; WHITNEY CONTRACTING INC.;  
WOLKOW-BRAKER ROOFING CORP.; WORLD TRADE  
CENTER PROPERTIES LLC; WSP CANTOR SEINUK;



YANNUZZI & SONS, INC.; YONKERS CONTRACTING  
COMPANY, INC.; YORK HUNTER CONSTRUCTION, LLC;  
ZIEGENFUSS DRILLING, INC.;

OFF SITE:

100 CHURCH, LLC, ALAN KASMAN DBA KASCO,  
AMERICAN EXPRESS BANK, LTD, AMERICAN EXPRESS  
COMPANY, AMERICAN EXPRESS TRAVEL RELATED  
SERVICES COMPANY, INC., ANN TAYLOR STORES  
CORPORATION, BANKERS TRUST COMPANY, BATTERY  
PARK CITY AUTHORITY, BFP TOWER C CO. LLC., BFP  
TOWER C MM LLC., BLACKMON-MOORING-STEAMATIC  
CATASTROPHE, INC. D/B/A BMS CAT, BROOKFIELD  
FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL  
PROPERTIES, LP, BROOKFIELD PARTNERS, LP,  
BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD  
PROPERTIES HOLDINGS INC., BT PRIVATE CLIENTS  
CORP., CUNNINGHAM DUCT CLEANING CO., INC.,  
DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK  
TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST  
CORPORATION, ENVIROTECH CLEAN AIR, INC., GPS  
ENVIRONMENTAL CONSULTANTS, INC., HILLMAN  
ENVIRONMENTAL GROUP, LLC., INDOOR  
ENVIRONMENTAL TECHNOLOGY, INC., KASCO  
RESTORATION SERVICES CO., LAW ENGINEERING P.C.,  
LEHMAN BROTHERS HOLDINGS INC., LEHMAN  
BROTHERS, INC., LEHMAN COMMERCIAL PAPER, INC.,  
MERRILL LYNCH & CO, INC., NOMURA HOLDING  
AMERICA, INC., NOMURA SECURITIES INTERNATIONAL,  
INC., ROYAL AND SUNALLIANCE INSURANCE GROUP,  
PLC, STRUCTURE TONE (UK), INC., STRUCTURE TONE  
GLOBAL SERVICES, INC., THE BANK OF NEW YORK  
TRUST COMPANY NA, TISHMAN INTERIORS  
CORPORATION, TOSCORP INC., TRAMMELL CROW  
COMPANY, TRAMMELL CROW CORPORATE SERVICES,  
INC., TRC ENGINEERS, INC., TUCKER ANTHONY, INC.,  
TULLY CONSTRUCTION CO., INC., TULLY INDUSTRIES,  
INC., VERIZON NEW YORK, INC., WESTON SOLUTIONS,  
INC., WFP RETAIL CO. G.P. CORP., WFP RETAIL CO. L.P.,  
WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP  
TOWER A. CO., L.P., WFP TOWER B CO. G.P. CORP., WFP

TOWER B HOLDING CO., LP, WFP TOWER B. CO., L.P.,  
AND ZAR REALTY MANAGEMENT CORP., ET AL.,

Defendants.


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PLEASE TAKE NOTICE that defendants, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC. (hereinafter "STRUCTURE TONE"), as and for their responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts STRUCTURE TONE's Answer to the Master Complaint dated July 30, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

To the extent that STRUCTURE TONE's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above-captioned matter, STRUCTURE TONE denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
July 25, 2008



WILLIAM D. JOYCE, III (WDJ 9899)

BARRY, McTIERNAN & MOORE

Attorneys for Defendants

STRUCTURE TONE, INC. s/h/a

STRUCTURE TONE (UK), INC. and

STRUCTURE TONE GLOBAL SERVICES, INC.

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